FOX, IMES, & CROSBY, LLC Troy S. Fox, Esq. Nevada Bar No. 11127 601 S. 10<sup>th</sup> St. Suite 202 Las Vegas, NV 89101

TFox@FICLegal.com

1

2

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

## DISTRICT COURT CLARK COUNTY, NEVADA

Case No. 23-14371-NMC In re: Chapter: 13 Leo Harold Santoro. Debtor. Adv. Case No. 24-01004-NMC Stephanie Santoro, et al., Plaintiff, Hearing Date: 08/08/2024 VS. **Hearing Time:** 9:30 a.m. Leo Harold Santoro, et al., Declaration of Troy S. Fox in Support of **Counsel's Motion to** Defendant.

- I, Troy S. Fox, Esq., declare the following:
- 1. I am an attorney with Fox, Imes, & Crosby, the law firm currently representing the Debtor in above cited Adversary Case.
- 2. I am familiar with the above titled case, and I have reviewed various notes and spoken with staff and am familiar with the circumstances regarding this case. I have been the lead attorney handling this case since we began to represent Mr. Santoro in late February of 2024.

Withdraw as Counsel

3. At this point, issues have arisen between Mr. Santoro and the Firm, particularly myself as his primary counsel. The situation is to the point that I no longer believe that I can continue to zealously represent Mr. Santoro in this adversary case. Nor is any other attorney at the firm able or willing to take on this Adversary matter at this time.

- 4. It is my opinion that Fox, Imes & Crosby, LLC can no longer continue to represent the Debtor or to accomplish his goals regarding the pending Adversary Complaint.
- 5. The Debtor and Counsel have reached a point where the attorney-client relationship has become unsustainable, and Counsel believes it is necessary to withdraw at this time.
- 6. It is my opinion that withdraw at this time will not prejudice the Debtor's pending case as the Answer has been filed, and currently the only pending hearing is a Status Check set for July 11, 2204, which will be attended by Fox, Imes, & Crosby as it is unlikely this Motion will be heard before that. Counsel will seek to continue the status, past the Date of this Motion. There are no other pending hearings or motion related to the Adversary matter.
- 7. Mr. Santoro has counsel representing him in the underlying bankruptcy case, who is handling the Chapter 13 confirmation process and related matters. The withdrawal of Fox, Imes, & Crosby does not impact the underlying bankruptcy case.

I declare under penalty of perjury the forgoing is true and correct.

Dated this 28th day of June 2024.

/s/ Troy S. Fox

Troy S. Fox, Esq. Fox, Imes, & Crosby, LLC